

1 STEVEN H. GURNEE, ESQ. SB# 66056  
2 DAVID M. DANIELS, ESQ. SB# 170315  
3 NICHOLAS P. FORESTIERE, SB# 125118  
GURNEE & DANIELS LLP  
3 2240 Douglas Boulevard, Suite 150  
Roseville, CA 95661-3805  
4 Telephone (916) 797-3100  
Facsimile (916) 797-3131  
5

6 Attorneys for Defendants  
7 ALDERWOODS GROUP, INC., PAUL HOUSTON  
SERVICE CORPORATION INTERNATIONAL,  
SCI FUNERAL AND CEMETERY PURCHASING  
COOPERATIVE, INC., SCI EASTERN MARKET  
SUPPORT CENTER, L.P., SCI WESTERN MARKET  
SUPPORT CENTER, L.P., and SCI HOUSTON  
MARKET SUPPORT CENTER, L.P.  
8  
9

10

11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13

14 WILLIAM HELM, DEBORAH PRISE, ) No. CV 08-01184 SI  
15 HEATHER P. RADY, et al., on behalf of )  
themselves and all other employees and former )  
employees similarly situated, )  
17 Plaintiffs, ) [PROPOSED] ORDER PERMITTING  
vs. ) WITHDRAWAL OF DEFENDANTS'  
18 ) MOTIONS TO STAY AND DISMISS  
19 ALDERWOODS GROUP, INC., PAUL A. ) ACTION PENDING FURTHER  
HOUSTON, SERVICE CORPORATION ) PERSONAL JURISDICTION  
INTERNATIONAL, SCI FUNERAL AND ) DISCOVERY  
CEMETERY PURCHASING )  
COOPERATIVE, INC., SCI EASTERN )  
22 MARKET SUPPORT CENTER, L.P., SCI )  
WESTERN MARKET SUPPORT CENTER, )  
L.P., a/k/a SCI WESTERN MARKET )  
24 SUPPORT CENTER, INC., and SCI )  
HOUSTON MARKET SUPPORT CENTER, )  
L.P. )  
26 Defendants. )  
27

28 [PROPOSED] ORDER PERMITTING WITHDRAWAL OF DEFENDANTS' MOTIONS  
TO STAY AND DISMISS  
Case No.: CV 08-01184 SI

Pursuant to the Stipulation of counsel and good cause appearing, Defendants shall withdraw their Motions to Stay and Motions to Dismiss (Docket Nos. 95, 99, 106 and 109), without prejudice to re-file them at a later date to be determined by the Court pursuant to a schedule for completion of personal jurisdiction discovery and for hearing Defendants Motions to Stay and Dismiss, which will be established by the Court at the time of the March 20, 2009 hearing on Plaintiffs' anticipated Motion to Compel. Plaintiffs shall not attempt to take the defaults of any of the Defendants in this matter as a result of their withdrawal of the above-referenced Motion to Stay and Motions to Dismiss.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_



Honorable Susan Illston  
United States District Court

**[PROPOSED] ORDER PERMITTING WITHDRAWAL OF DEFENDANTS' MOTIONS  
TO STAY AND DISMISS**  
Case No.: CV 08-01184 SI